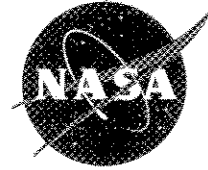


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



November 29, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at a Workshop Forum and Conference hosted by United States Air Force Academy's Eisenhower Center for Space and Defense Studies on November 29-30, 2011.

On the November 29-30, 2011, the United States Air Force Academy's Eisenhower Center for Space and Defense Studies is hosting a workshop forum and conference at the Hyatt Orlando International from 8 AM – 4 PM. Space Florida, a nonprofit organization under 501(c)(3) of the Internal Revenue code, is sponsoring the event. The purpose of this event is to discuss the future of national space capabilities.

Approximately 80 guests are invited to this event, including State and federal government officials, academia, industry representatives, NASA personnel, and employees from other federal agencies including DHS, OSD, NRO and FAA. The estimated cost per person for all food and beverages is \$45 per day. I find that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception will allow NASA employees an opportunity to discuss issues of interest to the scientific community, including NASA research and discoveries, with other attendees.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the event for themselves and their invited spouses or guests.

NASA employees whose duties substantially affect the sponsors or any of its members, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

fw Rebecca J. Greenstone
Adam F. Greenstone